

SL2 7/6/18

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

Jonathan Andrew Parrott

Case No.

H18-1068M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 7, 2017 - May 9, 2018, in the county of Brazoria in the
Southern District of Texas, the defendant(s) violated:

Code Section

18 U.S.C. § 2252A (a)(5)(B)

Offense Description

Any person who knowingly possesses any material that contains an image of child pornography that has been mailed or shipped or transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce by any means, including by computer.

This criminal complaint is based on these facts:

See attached Affidavit.

☒ Continued on the attached sheet.


Complainant's signature

Ryan J. Shultz, FBI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date:

July 6, 2018



Judge's signature

City and state:

Houston, Texas

Christina A. Bryan, United States Magistrate Judge

Printed name and title

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN THE MATTER OF:

Jonathan Andrew Parrott

§
§

Case No.

H18-1068M

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Ryan J. Shultz, being duly sworn, hereby depose and state the following:

1. I am a Special Agent of the Federal Bureau of Investigation (FBI) and have been so employed since September 2008. I am charged with the duty of investigating violations of the laws of the United States, collecting evidence in cases in which the United States is or may be a party in interest and performing other duties imposed by law. During my assignment with the FBI I have participated in the execution of search warrants for documents and other evidence, including computers and electronic media, in cases involving child pornography and the sexual exploitation of children. I have investigated many cases involving child pornography and the sexual exploitation of children. I have also participated in various FBI mandated and volunteer training for the investigation and enforcement of federal child pornography laws in which computers were used as the means for receiving, transmitting and storing child pornography as defined in Title 18, United States Code, Section 2256.
2. This Affidavit is made in support of a criminal complaint charging Jonathan Andrew Parrott with violating 18 U.S.C. § 2252A(a)(5)(B) (possession of child pornography).
3. This affidavit is submitted for the limited purpose of establishing probable cause in support of the attached Complaint and therefore contains only a summary of the relevant facts. I have not included each and every fact known by me concerning the individuals and events described herein. The information contained in this affidavit is based on my firsthand knowledge as well as information obtained through witness interviews conducted by me or other Law Enforcement Officers or Special Agents of the FBI and a review of various records.

4. On May 21, 2018, your Affiant returned a telephone call to Judith Baumann regarding a complaint she had filed alleging that Jonathan Andrew Parrott, a family acquaintance and a recently former occupant of her residence, owned a desktop computer that was understood to be storing large amounts of child pornography material.
5. Baumann explained that she had been friends with Jonathan Andrew Parrott's wife, Jennie Parrott, who passed away due to illness on or about January 29, 2018. Prior to her passing, Jennie Parrott requested that Baumann help take care of Jennie's 9-year-old daughter, AP; because she did not believe AP's father, Jonathan Andrew Parrott, was fit to be a parental guardian. However, Jennie Parrott died without a will and without a legal custody plan for her daughter AP. As a result, AP was placed in the custody of her biological father, Jonathan Andrew Parrott, hereinafter referred to as Parrott. Baumann advised that she had known Parrott for approximately 20 years and expressed concerns regarding his conduct around minor females.
6. Baumann explained that when both she and Parrott were approximately 15 or 16 years of age, Baumann walked in on Parrott about to vaginally penetrate a 5-year-old female identified as MV. Baumann stopped the inappropriate physical contact and escorted MV to her home. Baumann also reported the incident to MV's parents; however, nothing was ever done to address the situation. Given the above, Baumann was very concerned regarding the safety of AP while in the custody of Parrott.
7. Given Jennie Parrott's dying request and her concerns for AP's safety, Baumann allowed Parrott and AP to stay in her home on a temporary basis. Parrott and AP moved into Baumann's residence in early February 2018. Shortly thereafter, Parrott brought several personal items to Baumann's residence to include several electronic devices. Baumann advised that those devices were frequently and solely utilized by Parrott with the exception of Baumann's 13-year-old son, RB, using Parrott's Antec desktop computer for a short time in order to complete a school project.
8. On May 16, 2018, the Angleton Police Department was called to Baumann's residence at which time Parrott was ultimately arrested for an outstanding warrant for Driving While Intoxicated (DWI). While Parrott was in custody, Baumann gave the Antec

desktop computer an Infinitive 64 GB flash drive to a friend, Jessie Tovar, for the purposes of relinquishing the devices to law enforcement.

9. After allegedly being turned away by both the Tomball Police Department and the Montgomery County Sheriff's Office, Tovar elected to take the Antec desktop computer and the Infinitive 64 GB flash drive to an independent Information Technology and Computer Services business by the name REQ-ON Technologies. The owner and sole employee of REQ-ON Technologies, Certified IT Professional Willy Salcedo, accepted the aforementioned devices with the understanding that those devices belonged to a third party and that there were concerns that the owner of the submitted devices may be involved in criminal activity to include the exploitation of children.
10. Salcedo initiated his forensic analysis of the Antec desktop computer and the Infinitive 64 GB flash drive on May 17, 2018. Salcedo began his analysis by reviewing the Infinitive 64 GB flash drive which was plugged into the front of the Antec desktop computer via an internal USB cable. Salcedo's analysis of the flash drive revealed the presence of more than 14,000 files to include thousands of still image and video files, which Salcedo was able to review in the form of thumbnails.
11. Salcedo advised that during his brief review of the contents of the flash drive he had observed more than 300 files, or thumbnail images, depicting minor females, estimated to be between 8 and 10 years of age, nude and modeling in sexually suggestive positions and/or engaged in sexual intercourse with adult males.
12. After observing the content described above, Salcedo immediately discontinued his analysis of the devices and reported his findings to the FBI Houston Public Access Line Complaint Center. Salcedo's complaint was received and subsequently routed to your Affiant on May 21, 2018. Salcedo also contacted Tovar in order to advise that Salcedo would maintain custody of the submitted devices until law enforcement arrived to collect them as evidence.
13. On May 22, 2018, your Affiant encountered Salcedo at his place of employment. Salcedo provided your Affiant with copies of the intake receipt, the applicable invoice as well as the typed notes describing Salcedo's actions and findings. Salcedo then retrieved the desktop computer tower from the rear of the shop.

14. The desktop computer tower was observed to be a large grey in color tower bearing the word "Antec" on the front in red lettering. A single Infinitive 64 GB flash drive was observed as plugged into a USB port which was protruding from the front of the desktop tower via an internal cable connector. Salcedo removed the desktop tower siding to reveal the presence of five hard drives stored within the internal storage compartment of the desktop tower. Only one of the hard drives appeared to be internally connected while the remaining four hard drives were layered on the internal floor of the desktop tower.
15. At that time, Salcedo clarified that he had not performed any forensics analysis of the five hard drives found inside the desktop computer tower. He had only conducted analysis of the flash drive, which was plugged into the desktop computer tower in the manner described above upon his receipt of the device. After having observed what he had estimated to be approximately 300 images of child pornography, Salcedo discontinued his analysis, stored the devices in a secure location, and notified law enforcement.
16. The Antec desktop computer and the Infinitive 64 GB flash drive were transported to the FBI Houston Headquarters Field Office located at 1 Justice Park Drive, Houston, Texas 77092. The items were stored in a locked cabinet within a secure office pending the acquisition of a federal search warrant.
17. Shortly thereafter, Baumann contacted your Affiant to advise that she had learned that following his release from law enforcement custody on or about May 18, 2018, Parrott had expressed intentions to relocate himself and AP to Parachute, Colorado to live with Parrott's parents. On or about May 25, 2018, Child Protective Services and local law enforcement officers located Parrott and AP in Parachute, Colorado. Baumann advised that Parrott had never returned to her residence to collect his personal possessions which included another desktop computer and a cellular telephone.
18. On May 29, 2018, Judith Baumann traveled to the FBI Houston Headquarters Field Office located at 1 Justice Park Drive, Houston, Texas 77092 for the purposes of relinquishing additional devices that Parrott had abandoned within her residence. The items submitted by Baumann were described as one Dell Dimension 4550 desktop

computer and one LG cellular telephone. The items were accepted for intake and stored with the previously collected items pending the acquisition of a federal search warrant.

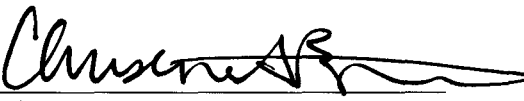
19. On June 11, 2018, your Affiant obtained a federal search warrant for the aforementioned electronic devices which included an Antec desktop computer, an Infnitive 64 GB flash drive, a Dell Dimension 4550 desktop computer and an LG cellular telephone.
20. A review of the devices revealed the presence of approximately 540 image files which meet the federal definition of child pornography. The observed images are summarily described as depicting minor females, ranging in age from approximately 5 to 15, engaged in sexual conduct to include vaginal penetration, bondage as well as lewd and lascivious displays of the genitals. Furthermore, your Affiant observed several known series in Parrott's collection which depicted known child victims identified by the National Center for Missing and Exploited Children (NCMEC).
21. In addition to the images of child pornography that were observed, your Affiant also observed hundreds of images of child erotica which included minor females modeling in sexually suggestive positions as well as animations depicting minor females engaged in various sex acts to include sexual intercourse, bondage and sadomasochistic behavior.
22. According to the metadata associated with many of the images, the files depicting child pornography were introduced to the respective devices and/or were last viewed on the devices between the dates ranging from June 7, 2017, to May 9, 2018.

CONCLUSION

23. Based on all information set forth above, your Affiant believes there is probable cause to believe that from on or about June 7, 2017, through on or about May 9, 2018, Jonathan Andrew Parrott, was in violation of Title 18 U.S.C. § 2252A (a)(5)(B)- the possession of child pornography.


Ryan J. Shultz, FBI Special Agent

Subscribed and sworn before me this 6th day of July 2018.


Christina A. Bryan
United States Magistrate Judge